

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re: Chapter 13 Case
Paul Hansmeier, Bky. No. 15-42460 (KHS)
Debtor.

**JUDGMENT CREDITORS' RESPONSE TO EXPEDITED MOTION OF
DEBTOR FOR APPROVAL OF SALE OF PROPERTY OF THE ESTATE**

1. Best & Flanagan LLP ("B&F") is the holder of five judgments (the "Judgments") against Paul Hansmeier (the "Debtor") by virtue of assignments filed in the Hennepin County District Court, Court File No. 27-cv-12-20976, and by representation in the companioned Court File No. 27-cv-14-15391. The Judgments are in favor of B&F, Paul Godfread, Esq., Phillip Gainsley, Esq., Thompson Hall Santi Cerny & Katkov (formerly Thompson Hall Santi Cerny & Dooley), and Sandipan Chowdhury, through his counsel Booth Sweet LLP (collectively, "Judgment Creditors").

2. Judgment Creditors join in the response of the Chapter 13 Trustee including with respect to objections to the timeliness of the Debtor's motion for approval of sale of property of the estate. The motion was filed shortly before the Thanksgiving holiday, scheduled to be heard on December 2, 2015, and therefore have given insufficient time for Judgment Creditors to properly respond.

3. Given the short time provided to respond to the Debtor's motion, Judgment Creditors reserve all rights to respond to the motion.

4. Further, given the Debtor's untimely motion and notice of sale of property that may be or is property under the power of the Chapter 13 trustee, Judgment Creditors request that all of the sale proceeds from the Debtor's sale of his condo, if permitted to be sold on or about December 10, 2015, be held in escrow or deposited with the Chapter 13 Trustee pending the resolution of the United States Trustee's Motion to Convert and any investigation into and resolution of the Debtor's pre-petition transfers.

Respectfully submitted,

Date: December 1, 2015

BEST & FLANAGAN LLP

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